that Babbitt was a close friend of the Ecksteins. She did not remind her husband of the conversation until the matter hit the press. Paul Eckstein has no recollection of the conversation with his wife, but also has no reason to believe it did not occur.

Later that evening, Goff called Havenick's office from Chicago. In these calls, Goff relayed to Havenick more details of Eckstein's meeting with Secretary Babbitt. Havenick recalled learning that Eckstein had said "no" in response to Babbitt's asking "do you know how much money is involved," to which the Secretary proceeded to reply, "somewhere on the order of a half million dollars."

Eckstein has no recollection of speaking with Havenick on July 14 after the Babbitt meeting, but he recalls speaking at length with Havenick and Goff the next day by phone. At that time, Eckstein says that he recounted all details of his meeting with Babbitt.

In addition, not long after his return to Phoenix, Eckstein spoke with the senior partner in Brown & Bain, Jack Brown, about the Hudson matter and his meeting with Babbitt. Brown had known Babbitt since his days as an associate at the firm, when Brown was a mentor to the future Secretary. In significant detail, Brown recently recalled that conversation, and Eckstein's relating to him that Babbitt had told Eckstein the application was being denied because the White House wanted it decided that day, as well as a closing question by Babbitt in the discussion to the effect of, "[d]o you know how much money the Indian tribes have been contributing to the Democratic

⁴⁷⁵Havenick G.J. Test. at 108.

⁴⁷⁶Phone and time billing records reflect such a call.